United States Nuclear Regulatory Commission Official Hearing Exhibit

In the Matter of: Entergy Nuclear Operations, Inc.
(Indian Point Nuclear Generating Units 2 and 3)

ASLBP #: 07-858-03-LR-BD01 **Docket #:** 05000247 | 05000286

Docket #: 05000247 | 05000286 Exhibit #: ENT000480-00-BD01 Admitted: 10/15/2012

Rejected: Other:

NERA

Economic Consulting

Identified: 10/15/2012

Withdrawn:

Stricken:

ENT000480

Submitted: March 30, 2012

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Senior Vice President

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David Harrison Senior Vice President

Dr. David Harrison is Senior Vice President and head of NERA's global environment practice. He has extensive experience evaluating a wide range of energy and environmental policies as a consultant, academic and government official.

Dr. Harrison has extensive experience over more than two decades evaluating the costs and benefits of air quality regulations and other social regulatory policies, including various health and safety regulations. These studies have been done for a large number of sectors, including electricity, automobile, trucking, marine, chemical, iron and steel, petroleum, pulp and paper, small utility engines, small handheld equipment, snowmobiles, construction equipment, and others. He and his colleagues have worked closely with company officials and collaborated with various technical consultants in the development of information on these programs. The results of these analyses have been presented to company officials, government agencies, and the media.

Dr. Harrison has been active in the development and economic assessment of climate change policies around the world. Building upon more than two decades of experience with emissions trading programs, he has participated in the development or evaluation of major greenhouse gas emission trading programs and proposals in the United States, including those in California, the Northeast, the Midwest and various federal initiatives, as well as programs in Europe and Australia. He and his colleagues have assisted the European Commission and the UK government with the design and implementation of the European Union Emissions Trading Scheme and national European programs related to climate change, renewable policies, and energy efficiency policies. He also has directed numerous projects for individual companies and trade associations—including those in electricity, oil and gas, refining, petrochemical, pulp and paper, cement, iron and steel, chemical, aluminum and other sectors—using the NERA Carbon Financial Impacts Model, which combines a national state-of-the-art model of energy and related sectors with detailed information on potential climate change policies and company-specific information. Dr. Harrison and his colleagues have used the NERA Carbon Financial Impacts

Model to evaluate the impacts of climate change, renewable and energy efficiency policies on company and sector revenues and costs and to assess company investment and other strategies in light of climate change policies. He has lectured frequently on climate change and related topics at numerous conferences in the U.S. and abroad.

Dr. Harrison has directed benefit-cost analyses for numerous facilities under Section 316(b) of the Clean Water Act. These have included facilities on the major water bodies, including the Atlantic Coast, the Great Lakes, the Pacific Coast, and various rivers. The power plants have included numerous nuclear and fossil units. These assessments have included estimates of the potential impacts on electricity cost and reliability using detailed electricity market models in various electricity regions of the United States. Dr. Harrison has testified regarding these cost-benefit assessments in numerous state workshops and administrative hearings. He also has assisted the Utility Water Act Group (UWAG), the Edison Electric Institute (EEI) and individual utilities in their evaluation of the EPA 316(b) regulations. He has presented the results of these assessments to senior EPA and OMB officials. Dr. Harrison was a co-signer of an Amicus Brief submitted to the Supreme Court of the United States regarding the comparison of benefits and costs under Section 316(b) of the Clean Water Act.

Dr. Harrison has led approximately 50 assessments of the impacts of major economic activities and policies on local, state, regional and national economic metrics, including employment, gross regional product, personal income and tax revenues. These assessments include direct effects as well as the multiplier effects of these activities on the various economies. Dr. Harrison has directed studies of the economic impacts of major energy infrastructure (power plants, natural gas pipelines and others), transportation infrastructure (airports, highways), manufacturing activities (including chemical, petrochemical, automotive and many others), and large commercial and retail developments. In addition, he has directed studies evaluating the economic impacts of numerous energy and environment policies. These assessments have used a wide range of economic models, including state-of-the-art regional models such as that developed by Regional Economic Models, Inc. (REMI) as well as customized models based upon available data. The projects have been developed for numerous areas in the U.S. and abroad including Arkansas, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Illinois, Indiana, Iowa, Maine, Massachusetts, Michigan, Minnesota, Missouri, Montana, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and Wisconsin as well as the U.S. as a whole and various countries and sub-regions in Africa, Europe, and the Caribbean.

Before joining NERA, Dr. Harrison was an Associate Professor at the John F. Kennedy School of Government at Harvard University, where he taught microeconomics, energy and environmental policy, cost-benefit analysis, transportation policy, regional economic development, and other courses for more than a decade. He also served as a Senior Staff Economist on the U.S. government's President's Council of Economic Advisors, where he had responsibility for environment and energy policy issues. He is the author or co-author of two books on environmental policy and numerous articles on various topics in professional journals.

Dr. Harrison received a Ph.D. in Economics from Harvard University, where he was a Graduate Prize Fellow. He holds a B.A. *magna cum laude* in Economics from Harvard College, where he was a member of Phi Beta Kappa, and a M.Sc. in Economics from the London School of Economics, where he was the Rees Jeffreys Scholar.

Education

Harvard University

Ph.D., Economics M.A., Economics

London School of Economics and Political Science

M.Sc., Economics

Harvard University

B.A., Economics, magna cum laude

Professional Experience

National Economic Research Associates, Inc.

1988- Senior Vice President, Vice President. Directs projects in the economics of the environment, energy, transportation, regional economic development and other areas.

Putnam, Hayes & Bartlett, Inc.

1987-1988 *Senior Associate*. Directed projects in the economics of energy, antitrust, and other areas.

Dun & Bradstreet Technical Economic Services

1985-1987 *Director of Product Development*. Directed economic studies in energy, transportation, and industrial location.

John F. Kennedy School of Government, Harvard University

1980-1985 Associate Professor. Areas of instruction: microeconomics; benefit-cost analysis; environment; energy; natural resource economics; urban economics; transportation; law and economics. Participant, Harvard Faculty Project on Regulation. Faculty Steering Committee, Energy and Environmental Policy Center. Principal investigator in research grants.

President's Council of Economic Advisors

1979-1980 Senior Staff Economist. Worked with other White House staff and agency officials on domestic issues. Areas of responsibility included energy, environment, transportation, and antitrust. Principal staff on the Regulatory Analysis Review Group. Principal White House staff for the review of Administration policy regarding the automotive industry.

Department of City and Regional Planning, Harvard University

Assistant and Associate Professor. Areas of instruction: microeconomics; statistics; econometrics; transportation; environment; urban development; and housing policy. Participant, MIT-Harvard Joint Center for Urban Studies. Faculty Chairman, Concentration in Land Use and Environment.

National Bureau of Economic Research

1974 Research Associate. Co-author of benefit-cost study of automotive air pollution prepared by the National Academy of Sciences for the Committee on Public Works, U.S. Senate.

U.S. Department of Transportation

1973-1974 *Economist*. Performed economic studies of transportation issues, including urban mass transportation, automobile emission and safety programs, and highway finance.

Department of Economics, Harvard University

1970-1974 *Teaching Fellow and Assistant Head Tutor*. Areas of instruction: microeconomics; macroeconomics; econometrics; transportation; public finance; environmental policy; and housing policy.

The Urban Institute

1971 *Research Economist.* Participated in econometric studies as participant in the Program on Local Public Finance.

U.S. Department of Housing and Urban Development

1969 *Economist*. Participated in economic evaluations of HUD infrastructure programs, primarily the water and sewer grant program.

Honors and Professional Activities

Summa Cum Laude, Senior Honors Thesis, Harvard University.

Phi Beta Kappa, Harvard University.

Rees Jeffreys Scholar in the Economics of Transport, London School of Economics.

Graduate Prize Fellowship, Harvard University.

Member, American Economic Association.

Member, Association of Environmental and Resource Economists.

Member, International Association of Energy Economists.

- Member, Public Policy for Surface Freight Transportation Study, Transportation Research Board, National Research Council.
- Member, Advisory Committee, Massachusetts Department of Environmental Quality Engineering.
- Member, Peer Review Panel, National Acid Precipitation Assessment Program.
- Member, Public Health and Socio-Economic Task Force, South Coast Air Quality Management District (Los Angeles).
- Member, Marketable Permits Advisory Committee, South Coast Air Quality Management District (Los Angeles).
- Member, Socioeconomic Technical Review Committee, South Coast Air Quality Management District (Los Angeles).
- Member, Harvard Graduate Society Council.
- Member, RECLAIM Advisory Committee (Los Angeles).
- Member, Board of Trustees, Cambridge Health Alliance (Harvard Medical School Teaching Hospital).
- Participant, Aspen Institute Dialog on Climate Change.
- Member, U.S. Government Accountability Office Expert Panel on International Greenhouse Gas Emissions Trading.
- Consultant to the following public and private organizations:
- U.S. Environmental Protection Agency; U.S. Department of Transportation;
 Massachusetts Port Authority; Organization for Economic Cooperation
 and Development (OECD, Paris); European Commission DirectorateGeneral Environment; Civil Aeronautics Board; Italian Ministry of
 Environment; Massachusetts Department of Environmental Protection;
 UK Department of Transport; UK Department for Environment, Food and
 Rural Affairs, UK Department of Trade and Industry, City of Chicago
 Department of Aviation; Conference Board of Canada; South Coast Air
 Quality Management District; Massachusetts Department of
 Environmental Management; and numerous state and local governments,
 trade associations, and private firms.

Reviewer for the following professional journals:

American Economic Review; Review of Economics and Statistics; Journal of Political Economy; Journal of Environmental Economics and Management; Journal of Urban Economics; Journal of Regional Science; Journal of Policy Analysis and Management; and Public Policy.

I. Publications

A. Books

Who Pays for Clean Air. Cambridge, MA: Ballinger Publishing Company, 1975.

The Automobile and the Regulation of Its Impact on the Environment (co-author). Norman, OK: Oklahoma University Press, 1975.

B. Articles and Published Reports

"Economic Policy Instruments for Reducing Greenhouse Gas Emissions" (with Andrew Foss, Per Klevnas, and Daniel Radov), chapter in *Oxford Handbook of Climate Change*, edited by David Schlosberg, John Dryzek, and Richard Norgaard, August 2011.

Climate Change Risks and Opportunities: How Companies Can Develop Information to Comply with SEC Guidance Regarding Climate Change Disclosure (with Andrew Foss), NERA Economic Consulting, February 2010.

A Victory for Economic and Environmental Rationality: Supreme Court Allows Cost-Benefit Analysis in Setting Important Clean Water Act Standards, NERA Economic Consulting, May 2009.

What Every Company Should Do to Prepare for a Mandatory US Greenhouse Gas Cap-and-Trade Program, in Climate Policy Economics Insights, NERA Economic Consulting, March 2009.

Now the Hard Work: How to Get the "Biggest Bang for the Buck" from the Federal Economic Stimulus Package, NERA Economic Consulting, February 2009.

Evaluation of Borrowing as a Method to Contain Costs in a Greenhouse Gas Emissions Capand-Trade Program (with Albert Nichols), Electric Power Research Institute, December 2008.

"Using Emissions Trading to Combat Climate Change: Programs and Key Issues" (with Per Klevnas, Albert Nichols and Dan Radov) in *Environmental Law Reporter*, June 2008.

Complexities of Allocation Choices in a Greenhouse Gas Emissions Trading Program (with Per Klevnas and Dan Radov), International Emissions Trading Association (IETA), September 2007.

"State Restrictions on Mercury Trading Could Prove Expensive, Ineffective" (with James Johndrow) in *Natural Gas Electricity, Volume 24, Number 2.* Isabelle Cohen, Hoboken, NJ: Wiley Periodicals, Inc., September 2007.

"Experience for Member States in Allocating Allowances: United Kingdom" (with Dan Radov) in *Allocation in the European Emissions Trading Scheme*. A. Denny Ellerman, Barbara K. Buchner and Carlo Carraro, Cambridge, UK: Cambridge University Press, 2007.

Interactions of Cost-Containment Measures and Linking of Greenhouse Gas Emissions Cap-and-Trade Programs, Electric Power Research Institute, November 2006.

Interactions of Greenhouse Gas Emission Allowance Trading with Green and White Certificate Schemes, European Commission Directorate-General Environment, November 2005.

Carbon Markets, Electricity Prices and "Windfall Profits"—Emerging Information from the European Union Emissions Trading Scheme, Electric Power Research Institute, September 2005.

Economic Instruments for Reducing Ship Emissions in the European Union, European Commission, Directorate-General Environment, June 2005.

Evaluation of the Feasibility of Alternative Market-Based Mechanisms to Promote Low-Emission Shipping in European Union Sea Areas, European Commission, Directorate-General Environment, March 2004.

"Assessing the Financial Consequences to Firms and Households of a Downstream Cap-And-Trade Program to Reduce U.S. Greenhouse Gas Emissions" in *A Climate Policy Framework: Balancing Policy and Politics*, John A. Riggs, ed., Washington, DC: The Aspen Institute, 2004.

Alternatives for Implementing the UK's National Allocation Plan, Department for Environment, Food and Rural Affairs, with AEA Technology and SPRU, August 2003.

Report on UK's Implementation of the CO₂ National Allocation Plan Under the European Union Greenhouse Gas Emissions Trading Programme, Department for Environment, Food and Rural Affairs, with AEA Technology and SPRU, July 2003.

"Ex Post Evaluation of the RECLAIM Emissions Trading Program for the Los Angeles Air Basin," National Policies Division, OECD Environment Directorate, June 2003.

Emission Trading in the U.S.: Experience, Lessons, and Considerations for Greenhouse Gases. (with Denny Ellerman and Paul Joskow). Pew Center on Global Climate Change, May 2003.

"Carbon Emission Trading: Creating a New Traded Commodity Market in Europe," in *WorldPower*, October 2002.

"A Groundbreaking Proposal: European Greenhouse Gas Emissions Trading," in *Infrastructure Journal*, August 2002.

"Europe Warms to Emissions Trading," in *Energy Regulation Brief*, NERA Economic Consulting, April 2002.

Evaluation of Alternative Initial Allocation Methods in a European Union Greenhouse Gas Emissions Cap-and-Trade Programme, European Commission Directorate-General Environment, March 2002.

"Economics Issues In Section 316(B) Decisions," in *A Towering Challenge*, C. Richard Bozek, Electric Perspectives, January/February 2002.

"Tradable Permit Programs for Air Quality and Climate Change," in *International Yearbook of Environmental and Resource Economics, Volume VI*, Henk Folmer and Thomas Tietenberg (Eds.). London: Edward Elgar, 2002.

Energy-Environment Policy Integration and Coordination Study (contributor), Palo Alto, CA: Electric Power Research Institute, December 2000.

Critical Issues in International Greenhouse Gas Emissions Trading: Setting Baselines for Credit-Based Trading Programs-Lessons Learned from Relevant Experience. Palo Alto, CA, Electric Power Research Institute, June 2000.

"Tradable Permits for Air Pollution Control: The United States Experience," in *Domestic Tradable Permit Systems for Environmental Management: Issues and Challenges*, J.P. Barde and T. Jones (Eds.). Paris: Organization for Economic Cooperation and Development, 1999.

"Emissions Trading: Turning Theory Into Practice in the Los Angeles Air Basin," in *Pollution for Sale: Emissions Trading and Joint Implementation*, S. Sorrell and J. Skea (Eds.). London: Edward Elgar, 1999.

"Commentary: International Greenhouse Gas Trading and the Kyoto Protocol," in *Climate Change Policy: Practical Strategies to Promote Economic Growth and Environmental Quality*, C. Walker, M. Bloomfield and M. Thorning (Eds.). Washington, DC: The American Council for Capital Formation Center for Policy Research, May 1999

"Priorities for the Development of GHG Trading Programs: Implications of the U.S. Experience," in Global *Climate Change: Science, Policy, and Mitigation/Adaptation Strategies*, C.V. Mathai and J. Kinsman (Eds.). Washington, DC: Air & Waste Management Association, October 1998.

"Commentary on 'Tradable Emissions Rights and Joint Implementation for Greenhouse Gas Abatement: A Look Under the Hood," in *The Impact of Climate Change Policy on Consumers: Can Tradable Permits Reduce the Cost?* C. Walker, M. Bloomfield, and M. Thorning (Eds.).

Washington, DC: The American Council for Capital Formation Center for Policy Research, April 1998.

"Considerations in Designing and Implementing an Effective International Greenhouse Gas Trading Program," Global Climate Coalition, October 1997.

"The Use of Externality Adders for Greenhouse Gas Emissions in Electric Utility Resource Planning," in *Internalization of Social Costs of Energy Conversion and Transportation in the United States and Europe for a Sustainable Development*, O. Hohmeyer and R. Ottinger (Eds.). Berlin: Springer-Verlag, 1996.

"Environmental Adders in the Real World," (with A. Nichols), in *Resources and Energy Economics*, December 1996.

"Recent Evidence on the Appropriate Timing of Reductions in Greenhouse Gas Emissions," (with A. Nichols), Global Climate Coalition, July 1996.

The Distributive Effects of Economic Instruments for Global Warming. Paris: Organization for Economic Cooperation and Development, 1996.

The Distributive Effects of Economic Instruments for Environmental Policy. Paris: Organization for Economic Cooperation and Development, 1994.

"The Socioeconomic Effects of Externality Adders for Electric Utility Emissions," in *Technical Review of Externalities Issues*. Electric Power Research Institute, December 1994.

"Utility Externalities and Emissions Trading: California is Developing a Better Way," in *Social Costs of Energy - Present Status and Future Trends*, R. Ottinger and O. Hohmeyer (Eds.). Berlin: Springer-Verlag 1994.

"Who Wins and Who Loses from Economic Instruments?" *The OECD Observer* 180:29-31, February/March 1993.

"Tradable Permits and Social Costing: The California Experience," prepared for the American Economic Association and Allied Social Science Association Meeting, Anaheim, California, January 6, 1993.

"Emissions Trading: A Better Way to Include Environmental Costs in Electric Utility Resource Planning," American Planning Association and Edison Electric Institute, March 1992.

"Economists' Contribution to the Environment," *Journal of Air and Waste Management Association*, October 1991.

"Potential Cost Savings and Environmental Effects of Using Emissions Trading to Manage NO_x in Ontario," (with A. Nichols), in *Air and Waste Management Through the 90's*, R. E. Clement (Ed.), Air and Waste Management Association, Ontario, Canada, April 1990.

"Market-Based Approaches for Environmental Protection: Implications for Business," (with A. Nichols), in *Special Report on Global Environmental Issues*, B. Gentry (Ed.). Washington, DC: The Bureau of National Affairs, 1990.

"Environmental Policy in Europe: Economic Lessons from the United States Experience," in *Environmental Damages*. Rome, V. Polidoro (Ed.). Italy: Italian Government Printing Office, August 1990.

Comments before the Department of Interior on Advanced Notice of Proposed Rulemaking Regarding Revision of Natural Resource Damage Assessment Regulations, 43 CFR Part 11, (with J. Hausman), November 1989.

"To Live and Breathe in L.A.," (with P. Portney, A. Krupnick, and H. Dowlatabadi), *Issues in Science and Technology* V(4):Summer 1989.

"Policy Approaches for Controlling Greenhouse Gases," Energy Research Group, May 1989.

"Yes to Clean Air, But at What Cost?" The New York Times, March 26, 1989.

"Realistic Air-Quality Goals Will Prevent Cost Explosion," *Los Angeles Times*, January 11, 1989.

"Put the Clock on Landing Fees," The Journal of Commerce, November 10, 1988.

"Reforming Airport Pricing to Reduce Congestion," Conference on Transportation Options for the 21st Century, Boston, Massachusetts, July 1988.

"Awaiting the Second Shoe at Congested Logan," *The Boston Globe*, March 29, 1988.

"Banning Hazardous Material from Land Disposal Facilities," *Hazardous Waste* 1(1984).

"Benefit-Cost Analysis of Environmental Regulation: Case Studies of Hazardous Air Pollutants," (with J. Haigh and A. Nichols), *Harvard Environmental Law Review* 8(1984).

Research and Demonstration of Improved Methods for Carrying Out Benefit-Cost Analysis of Individual Regulations, Volumes I - IV, (Principal Investigator), prepared for the U.S. Environmental Protection Agency, Final Report, November 1984.

"Using the Hedonic Housing Value Method to Estimate the Benefits of Hazardous Waste Cleanup," (with J. Stock), U.S. Environmental Protection Agency, November 1984.

- "Using the Averting Cost Method to Estimate the Benefits of Hazardous Waste Cleanup," (with M. O'Keeffe), U.S. Environmental Agency, November 1984.
- "The Value of Acquiring Information Under Section 8(a) of the Toxic Substances Control Act: A Decision-Analytic Approach," (with A. Nichols, L. Boden, and R. Terrell), U.S. Environmental Protection Agency, November 1984.
- "Hedonic Housing Values, Local Public Goods, and the Benefits of Hazardous Waste Cleanup," (with J. Stock), Discussion Paper, Energy and Environmental Policy Center, Harvard University, November 1984.
- "The Regulation of Aircraft Noise," in *Incentive Arrangements for Environmental Protection*, T. Schelling (Ed.). Cambridge, MA: MIT Press, 1983.
- "Benefit-Based Flexibility in Environmental Regulation," (with A. Nichols), Discussion Paper, Energy and Environmental Policy Center, Harvard University, April 1983.
- "Who Loses from Reform of Environmental Regulation," (with P. Portney), in *Reform of Environmental Regulation*, Wesley Magat (Ed.). Cambridge, MA: Ballinger Publishing Company, 1982.
- "Regulatory Reform in the Large and in the Small," (with P. Portney), in *Reforming Government Regulation*, LeRoy Graymer (Ed.). Beverly Hills, CA: Sage Publications, 1982.
- "Imports and the Future of the U.S. Automobile Industry," (with J. Gomez-Ibanez), *American Economic Review*, Papers and Proceedings 72 (May 1982).
- "Regulation and Distribution: An Agenda for Research," in *Creating An Agenda for Regulatory Research*, A. Ferguson (Ed.). Cambridge, MA: Ballinger Publishing Company, 1981.
- "Cost-Benefit Analysis and the Regulation of Environmental Carcinogens," in *Management of Carcinogenic Risk*, W. Nicholson (Ed.). New York: New York Academy of Sciences, 1981.
- "Distributional Objectives in Health and Safety Regulation," in *The Benefits of Health and Safety Regulation*, A. Ferguson (Ed.). Lexington, MA: D.C. Heath and Company, 1981.
- "The Local Government Role in Energy Policy," (with M. Shapiro), in *Energy and Environment: Conflict and Resolution*, R. Axelrod (Ed.). Lexington, MA: D.C. Heath and Company, 1981.
- "Making Ready for the Clean Air Act," (with P. Portney), Regulation 5(March/April 1981).
- "Discussion of Robert C. Ellickson, 'Public Property Rights: Vicarious Intergovernmental Rights and Liabilities as a Technique for Correcting Intergovernmental Spillovers," in *Essays on the Law and Economics of Local Government*, D. Rubinfeld (Ed.). Washington, D.C: The Urban Institute, 1979.

- "Simulating the Impacts of Transportation Policy on Urban Land Use," Discussion Paper, Department of City and Regional Planning, Harvard University, April 1979. (Presented at meeting of the Eastern Economics Association, May 1979.)
- "Income and Urban Development," Discussion Paper, Department of City and Regional Planning, Harvard University, April 1979.
- "The Distribution of Benefits from Improvements in Urban Air Quality," (with D. Rubinfeld), Journal of Environmental Economics and Management 5(December 1978).
- "The Impact of Transit Systems on Land Use Patterns in the Pre-Automobile Era," Discussion Paper, Department of City and Regional Planning, Harvard University, December 1978.
- "The Air Pollution and Property Value Debate: Some Empirical Evidence," (with D. Rubinfeld), *Review of Economics and Statistics* 60(November 1978).
- "Transportation Technology and the Dynamics of Urban Land Use Patterns," paper presented to the Conference on Urban Transportation, Planning, and the Dynamics of Land Use, Northwestern University, June 1978.
- "Hedonic Housing Values and the Demand for Clean Air," (with D. Rubinfeld), *Journal of Environmental Economics and Management* 5(March 1978).
- "Controlling Automotive Emissions: How to Save More Than \$1 Billion per Year and Help the Poor Too," *Public Policy* 2 (Fall 1977).
- "Reply to Michelle White's Comment on 'Cumulative Urban Growth and Urban Density Functions," (with J. Kain), *Journal of Urban Economics* 4(January 1977).
- "Cumulative Urban Growth and Urban Density Functions," (with J. Kain), *Journal of Urban Economics* 1(January 1974).

II. Consulting Reports for Directed Projects

A. Climate Change

Evaluation of Incentives in International Sectoral Crediting Mechanisms, prepared for Enel S.p.A., October 2011.

Environmental and Economic Impacts of the First Amendment Supplemental Filing to the 2009 Integrated Resource Plan, prepared for Nevada Power Company, October 2011.

Environmental Costs and Economic Impacts of the Second Amendment to the 2009 Integrated Resource Plan, prepared for Nevada Power Company, August 2011.

Environmental Costs and Economic Impacts of the 2010 Integrated Resource Plan, prepared for Sierra Pacific Power Company, July 2010.

Environmental Costs and Economic Impacts of the 2009 Integrated Resource Plan, prepared for Nevada Power Company, February 2010.

Follow-up letter to US Environmental Protection Agency Clarifying Key Conclusions from Review of EPA's Approach to Aggregating Emissions Across Time in Proposed Revisions of Renewable Fuel Standards, prepared on behalf of Growth Energy, January 2010.

Review of EPA's Approach to Aggregating Emissions across Time in Proposed Revisions of Renewable Fuel Standards, prepared for Growth Energy for submission to U.S. EPA, Docket ID No. EPA-HQ-OAR-2005-0161, September 2009.

Differentiation among Batches of Conventional Biofuels based on Greenhouse Gas Emissions, prepared for Growth Energy, September 2009.

Impacts of Waxman-Markey Bill on US Refiners: Preliminary Estimates, prepared for major industrial sector, July 2009.

Effects of Waxman-Markey on Natural Gas and Electricity Businesses: Phase 1, prepared for a Midwest utility, July 2009.

Environmental Costs and Economic Benefits of Electric Utility Resource Selection, prepared for Nevada Power Company, March 2009.

Impacts of the California Greenhouse Gas Emission Standards on Motor Vehicle Sales, prepared for the Alliance of Automobile Manufacturers, April 2009.

Accounting for Differences in the Timing of Emissions in Calculating Carbon Intensity for the California Low Carbon Fuels Standard, prepared for the Renewable Fuels Association, April 2009.

Environmental Costs and Economic Benefits of Electric Utility Resource Selection, prepared for Nevada Power Company, March 2009.

Evaluation of Alternative Benchmarked Sector-Level Allocation Formulas, prepared for a major U.S. industrial trade group, October 2008.

Impacts of Climate Change Policies Using the NERA Carbon Financial Impacts Model (Phase 2 Study, prepared for a major U.S. industrial manufacturer, June 2008.

Effects of the Regional Greenhouse Gas Initiative on Regional Electricity Markets, prepared for AES and Dynegy, June 2008.

Environmental Costs and Economic Benefits of Electric Utility Resource Selection, prepared for Nevada Power Company, May 2008.

Impacts of Potential Climate Change Policy using the NERA Carbon Financial Impacts Model, prepared for a major U.S. trade association, April 2008.

Market Conditions and the Pass-Through of Compliance Costs in a Carbon Emission Cap-and-Trade Program, prepared for Conoco Phillips, January 2008.

Evaluation of the Financial Impacts of Alternative Climate Change Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. industrial manufacturer, December 2007.

Evaluation of the Financial Impacts of Alternative Climate Change Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. energy company, November 2007.

Evaluation of the Financial Impacts of Alternative Climate Change Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. industrial manufacturer, October 2007.

Evaluation of the Financial Impacts of Alternative Climate Change Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. energy company, September 2007.

Environmental Costs and Economic Benefits of Electric Utility Resource Selection, prepared for Sierra Pacific Power Company, June 2007.

Evaluation of the Financial Impacts of Alternative Climate Change Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. energy company, March 2007.

Effectiveness of the California Light Duty Vehicle Regulations As Compared to Federal Regulations, in collaboration with Sierra Research, Inc. and Air Improvement Resource, Inc., prepared for the Alliance of Automobile Manufacturers, June 2007.

Financial Impacts of Potential Mandatory CO2 Cap-and-Trade Programs using the NERA Carbon Financial Impacts Model, prepared for a major U.S. trade association, January 2007.

Modeling the Fleet Population Effects of the Rhode Island Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, November 2005.

Review of Potential Expansion of the UK Phase II National Allocation Plan to the Petrochemical Sector, prepared for UK Department for the Environment, Food and Rural Affairs (DEFRA) and Department of Trade and Industry (DTI), November 2005.

The Impacts of CO₂ Prices on European Electricity Prices, prepared for Electricité de France (EDF), October 2005.

Modeling the Fleet Population Effects of the Massachusetts Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, October 2005.

Modeling the Fleet Population Effects of the Maine Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, October 2005.

Modeling the Fleet Population Effects of the New Jersey Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, September 2005.

Modeling the Fleet Population Effects of the Connecticut Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, September 2005.

Modeling the Fleet Population Effects of the Vermont Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, August 2005.

Modeling the Fleet Population Effects of the New York State Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, July 2005.

Initial Review of Potential Expansion of the UK Phase 2 NAP to Additional CO₂ Sources, prepared for the Department for the Environment, Food and Rural Affairs, May 2005.

Environmental and Economic Impacts of the ARB Staff Proposal to Control Greenhouse Gas Emissions from Motor Vehicles, prepared for the Alliance of Automobile Manufacturers, September 2004. Submitted to the California Air Resources Board.

Reviews of Studies Evaluating the Impacts of Motor Vehicle Greenhouse Gas Emissions Regulations in California, for the Alliance of Automobile Manufacturers, September 2004. Submitted to California Air Resources Board.

TXU Activities Regarding Actual and Potential US Air Emissions and Climate Change Policies, prepared for TXU Corporation, September 2004.

Strategies for Chubu Electric Power Co., Ltd., to Take Advantage of Opportunities Under Greenhouse Gas Emissions Trading Programs, in collaboration with Japan NUS Co., Lt, for Chubu Electric Power Co., Ltd, January 2004.

Impacts of ZEV Sales Mandate on California Motor Vehicle Emissions: Responses to Comments of Air Resource Board Staff and Related Documents Provided as Part of the 15-Day Notice (with Sierra Research, Inc.), prepared for the Alliance of Automobile Manufacturers, November 2001.

KEPCO's Role in a Greenhouse Gas Emissions Trading Program, prepared for Kansai Electric Power Company, February 2001.

International Carbon Emissions Trading Practices: Review of Recent Literature, prepared for Chubu Electric Power Company, February 2001.

The Timing of Plant Replacement and the Cost-Effectiveness of CO₂ Reductions from Two Canadian Utilities, prepared for Ontario Hydro and TransAlta Corporation, July 1996.

B. Air Quality

Environmental and Economic Impacts of the First Amendment Supplemental Filing to the 2009 Integrated Resource Plan, prepared for Nevada Power Company, October 2011.

Potential Impacts of EPA Air, Coal Combustion Residuals, and Cooling Water Regulations, prepared for the American Coalition for Clean Coal Electricity, September 2011.

Environmental Costs and Economic Impacts of the Second Amendment to the 2009 Integrated Resource Plan, prepared for Nevada Power Company, August 2011.

Environmental Costs and Economic Impacts of the 2010 Integrated Resource Plan, prepared for Sierra Pacific Power Company, July 2010.

Environmental Costs and Economic Impacts of the 2009 Integrated Resource Plan, prepared for Nevada Power Company, February 2010.

Economic Analysis of Proposed U.S. EPA Biocide Data Requirements, prepared for The American Chemistry Council, March 2009.

Evaluation of Potential Attainment Costs and Economic Impacts under a Potential Revised EPA 8-Hour Ozone Standard, prepared for the National Association of Manufacturers, January 2008.

Evaluation of a Voluntary SO₂ Trading Program for the Pulp and Paper Sector, prepared for the American Pulp and Paper Association, February 2007.

An Evaluation of Alternative Approaches to Reducing Pennsylvania Mercury Emissions, prepared for PPL Corporation, August 2006.

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Before the California Energy Commission ER-92 Hearing on Valuing Air Quality Impacts of Energy Resources, *Revised Damage-Based Values for Residual Emissions Valuation, (with M. B. Deming)*, testimony prepared on behalf of Southern California Edison Company, Sacramento, California, May 1992.

Before the State of California Energy Resources Conservation and Development Commission, *Valuing Air Quality Impacts of Alternative Energy Resources*, testimony prepared on behalf of Southern California Edison Company, Docket No. 90-ER-2, March 1992.

Before the California Energy Commission ER-92, *Group I Hearing Issues: Air Quality, (with Southern California Edison), 1992 Electricity Report,* testimony prepared on behalf of Southern California Edison Company, Docket No. 90-ER-92, submitted by Southern California Edison, November 1991.

Affidavit on Landing Fees at Logan International Airport, prepared on behalf of the defendant in *New England Legal Foundation, et al. v. Massachusetts Port Authority and National Business Aircraft Association, Inc., et al.*, United States District Court, District of Massachusetts, June 1988. (Also submitted to the U.S. Department of Transportation.)

Defendant's Expert Witness Disclosure on Summary of Damages Claimed by the State of Michigan for Fish Killed by the Luddington Pumped Storage Plant, prepared on behalf of Consumers Power Company and The Detroit Edison Company in Frank J. Kelley, ex rel Michigan Natural Resources Commission; Michigan Department of Natural Resources; and Gordon Guyer, Director of the Michigan Department of Natural Resources v. Consumers Power Company and The Detroit Edison Company, Case No. 86-57075-CE in the Circuit Court for the County of Ingham, June 1988.

IV. Presentations

A. Climate Change

"Incentives for International Sectoral Crediting Mechanisms," presented at the Workshop on New Market Mechanisms organized by the International Emissions Trading Association and Enel S.p.A., Brussels, October 13, 2011

"The Copenhagen Conference: International Climate Policy and Implications for US Policy," presented at the Fenway Colleges Climate Change Teach-In, Washington, DC, February 25, 2010.

"U.S. Greenhouse Gas Cap-and-Trade Programs and Cost Containment," presented at the EUEC 2010 Energy & Environment Conference, AZ, Phoenix, February 1, 2010.

"Financial Implications of a US Cap-and-Trade Program for Sectors and Companies," presented at 2nd Annual Carbon Trading Summit, New York City, January 13, 2010.

"Lessons Learned from the European Union Emissions Trading Scheme," presented to California State Senate Select Committee on Climate Change and AB 32 Implementation, Sacramento, CA, January 7, 2010.

"Greenhouse Gas Emissions Cap-and-Trade Program: Key Design Elements," presented at the IETA Fall 2009 Symposium, Washington, DC, November 3, 2009.

"Compliance Flexibility in Domestic Greenhouse Gas Cap-and-Trade Programs," presented to the 9th Annual Workshop on Greenhouse Gas Emissions Trading sponsored by the Electric Power Research Institute, the International Energy Agency, and the International Emissions Trading Association, Paris, September 14, 2009.

"Allocation Decisions in the European Union Emissions Trading Scheme," presented to the California Economic and Allocation Advisory Committee, July 1, 2009.

"Economic Analysis of Waxman-Markey Climate Bill (ACES)," presented as part of Environmental Markets Association Webinar, June 4, 2009.

"Climate Policy Risks for Electric Utilities: Economic Modeling to Assist Utilities in Responding to Climate Change Programs," presented at the Utility Rate Case Conference organized by Law Seminars International, Las Vegas, NV, February 6, 2009.

"Cost-Containment in a U.S. Greenhouse Gas Cap-and-Trade Program," presented at the EEI Fall 2008 Legal Conference, Boston, October 30, 2008.

"Climate Change and Electricity Prices: What Should Electricity Companies Do," presented at the EUCI Conference on Electricity, Chicago, September 30, 2008.

- "The EU Energy and Climate Package: Interactions between EU Policies and Targets and Implications for CO2 Price Uncertainty," presented at the IEA/IETA/EPRI 8th Annual Workshop on Greenhouse Gas Emissions Trading, Paris, September 23, 2008.
- "European Union Emissions Trading Scheme: Overview and Implications for the U.S.," presented at the Second Carbon Trading Summit, New York, NY, June 24, 2008.
- "Carbon Emissions Trading and Allocation: Complexities of Policy Choices," presented at the IETA/AIGN Workshop, Canberra, Australia, March 5, 2008.
- "Climate Change: What Every Company Should Do to Get Ready for a Mandatory Emissions Trading Program," presented at NERA Economic Consulting Workshop, Sydney, Australia, March 4, 2008.
- "Workshop on Carbon Emissions Trading: EU and US Experience and Implications for IP/Australia," presented before International Power, Melbourne, Australia, March 3, 2008.
- "Design Elements for Potential Canadian GHG Cap-and-Trade Program," presented at the Cap and Trade Working Group Retreat, Toronto, Ontario, January 31, 2008.
- "Allocation in the EU ETS: What Have We Learned?" presented at the MIT workshop on EU ETS, Washington, DC, January 24, 2008.
- "Emissions Trading: Background, Prior Programs and Implications for a U.S. Carbon Cap-and-Trade Program," presented at ALI-ABA Course on Clean Air: Law, Policy and Practice, Washington, DC, November 9, 2007.
- "Overview of the European Union Emissions Trading Scheme for Carbon Dioxide," presented at EEI's 2007 Fall Legal Conference, Napa, California, October 4, 2007.
- "Evaluating the Financial Impacts of Potential Carbon Cap-and-Trade Programs on Electricity Companies: What Every Electricity Company Should Do to Get Ready for Mandatory Climate Change Policy," presented at the Carbon Constraint Conference, Chicago, September 13, 2007.
- "EU ETS Allocation Options: Reconciling Complexities and Simplicity/Transparency," presented before the IETA-CEPS Climate Change Conference, Brussels, Belgium, June 26, 2007.
- "Overview of Allocation Methodologies and Principles," presented before the European Climate Change Programme working group on emissions trading, Brussels, Belgium, May 21, 2007.
- "Allocation Choices for a Carbon Trading Program," presented at the Carbon Expo, Cologne, Germany, May 3, 2007.

- "Allocation Choices and International Considerations," presented to Senate staff members, Washington, DC, February 2, 2007.
- "Carbon Financial Analyses for Electricity Companies," presented at the Electric Utilities Environmental Conference, Tucson, Arizona, January 23, 2007.
- "Carbon Emissions and State Electric Utility Regulation," presented at the Electric Utilities Environmental Conference, Tucson, Arizona, January 22, 2007.
- "European Union Emissions Trading Scheme for Carbon Dioxide: Lessons and Implications," presented at North America and The Carbon Markets Conference hosted by Point Carbon and Pew Center on Global Climate Change, Washington, DC, January 18, 2007.
- "Policy Design Side By Side: What Elements Matter," presented at North America and the Carbon Markets Conference hosted by Point Carbon and Pew Center on Global Climate Change, Washington, DC, January 17, 2007.
- "European Union," presented at North America and the Carbon Markets Conference hosted by Point Carbon and Pew Center on Global Climate Change, Washington, DC, January 17, 2007.
- "Carbon Markets, Linking, and Cost Containment," presented at the IEA/IETA/EPRI 6th Annual Emissions Trading Workshop, Paris, France, September 27, 2006.
- "Auctioning Experience in Other Sectors and Implications for Designing a Carbon Auction," presented at the IETA Workshop on Allocation Methodologies, Paris, France, September 25, 2006.
- "European Carbon Markets and Implications for a US Carbon Constrained Future," presented at Preparing for a Carbon Constrained Future Conference hosted by Electric Utility Consultants, Inc., Arlington, Virginia, June 28, 2006.
- "Overview of the European Union Emissions Trading Scheme," presented to staff of the Senate Committee on Energy and Natural Resources, Washington, DC, June 16, 2006.
- "Policies to Address Potential EU ETS Impacts on Power Prices and Industrial Competitiveness," presented at the CEPS/IETA Climate Change Conference, Brussels, Belgium, May 30, 2006.
- "Learning from Experience: First Year of the European CO₂ Emissions Trading Scheme," presented to New Prospects for Climate Change Regulation Panel organized by Harvard Law School, March 10, 2006.
- "Carbon Policies and Electric Utility Rate Cases," presented at the Managing the Modern Utility Rate Case Conference organized by Law Seminars International, Las Vegas, NV, February 14, 2006.

- "Beyond Cost: Carbon Markets, Electricity Prices and 'Windfall Profits,'" presented to Electric Utilities Environmental Conference, Tucson, AZ, January 23, 2006.
- "European CO₂ Emissions Trading Scheme: First Year Accomplishments and Implications," presented at an International Emissions Trading Association side event at the 11th Conference of the Parties to the Kyoto Protocol, Montreal, December 5, 2005.
- "Allocation Choices for a U.S. Carbon Dioxide Emissions Trading Scheme," presented to National Commission on Energy Policy, Workshop on Allowance Allocation, Washington, DC, September 30, 2005.
- "Carbon Markets, Electricity Prices and Windfall Profits: Emerging Information on the European Union Emissions Trading Scheme" presented to IEA-IETA-EPRI Emissions Trading Workshop, Paris, September 27, 2005.
- "U.S. State-level Climate Regimes: Lessons from the U.S. and Europe, presented to Fourth Annual Green Trading Summit, New York, NY, May 2, 2005.
- "Overview of Allocation Choices: Alternatives and Implications," presented to Stakeholder Workshop, Regional Greenhouse Gas Initiative, Boston, MA, October 14, 2004.
- "Emissions Trading: Concepts, Experience, Lessons, and Implications Greenhouse Gas Programs," presented to Iberdrola, Cambridge, MA, March 25, 2004.
- "How CEPCO Can Gain from CO₂ Trading," presented to Chubu Electric Power Co., Inc., Nagoya, Japan, November 25, 2003.
- "The Rise of Emissions Trading in Air Quality and Climate Change Policy," presented to EPRI Environmental Sector Council, San Antonio, Texas, September 12, 2003.
- "Greenhouse Gas Emissions Trading and Firm Risk Management Behavior", presented to the ARPEL-IPIECA Workshop, A Practical Approach to Identifying Emission Reduction Opportunities: Examples under the Kyoto Mechanisms in Latin America and the Caribbean, San Jose, Costa Rica, December 3, 2002.
- "Initial Allocations in Various Systems of Emissions Trading" presented to the Exploring New Approaches in Regulating Industrial Installations (ENAP) Workshop on Emissions Trading for NO_X and SO_X in Europe, The Hague, Netherlands, November 22, 2002.
- "Overview of Alternative Allocations for European GHG Trading Program," presented to IEA-EPRI-IETA Workshop on Greenhouse Gas Emissions Trading, Paris, September 17, 2002.
- "Evaluation of Alternative Allocations for European GHG Trading Program," presented to IEA-EPRI-IETA Expert Meeting: Allocation of GHG Objectives, Paris, September 16, 2002.

- "Greenhouse Gas Emission Trading Programs," presented to Chubu Electric Company, Cambridge, MA, July 16, 2002.
- "Evaluation of Alternative Allocations for European GHG Trading Program," presented to Chubu Electric Company, Cambridge, MA, July 16, 2002.
- "Corporate Strategies and Practices for GHG Emission Reduction," presented to Chubu Electric Company, Cambridge, MA, July 15, 2002.
- "Emission Trading: Concepts, Experience, and Lessons from Non-Greenhouse Gas Programs," presented to Chubu Electric Company, Cambridge, MA, July 15, 2002.
- "Prospects for the EU Greenhouse Gas Trading Program," presented to EPRI Global Climate Change Research Seminar, Washington, DC, June 4, 2002.
- "Evaluation of Alternative Allocations for European GHG Trading Program," presented to European Commission, Brussels, Belgium, November 13, 2001.
- "Evaluation of Alternative Allocations for European GHG Trading Program," presented to ENVECO, Brussels, Belgium, November 13, 2001.
- "CO₂ Permit Allocations: Evaluation of Alternatives for the EC," presented to the European Commission, Brussels, Belgium, March 5, 2001.
- "Setting Baselines for Greenhouse Gas Trading: Lessons from Experience," presented to United Nations Framework Convention on Climate Change, Bonn, Germany, June 10, 2000.
- "Setting Baselines for Greenhouse Gas Programs: Lessons from Experience," presented at the EPRI Global Climate Change Research Seminar, Washington, DC, May 18, 2000.
- "Emissions Trading and Developing Countries: Implications of U.S. Experience and World Bank Role," presented at World Bank Energy Week 2000, Washington, DC, April 13, 2000.
- "Domestic GHG Trading: Assessing Impacts on Electric Utilities," presented to Electric Power Research Institute, Washington, DC, February 17, 2000.
- "Energy-Environmental Policy Integration & Coordination (E-EPIC), U.S. Economic Growth & Health," presented to Electric Power Research Institute, Washington, DC, May 13, 1999.
- "Priorities for the Development of GHG Trading Programs: Implications of the United States Experience," presented to the EPRI Global Climate Change Area Meeting, San Diego, California, January 26, 1999.

- "Priorities for the Development of GHG Trading Programs: Implications of the United States Experience," presented to the Air & Waste Management Association Specialty Conference on Global Climate Change, Washington, DC, October 14, 1998.
- "International Greenhouse Gas Trading," presented to the American Council for Capital Formation, Washington, DC, September 23, 1998.
- "International Greenhouse Gas Emission Trading: Promise and Performance," presented to the EPRI Global Climate Change Research Seminar, Washington, DC, May 27, 1998.
- "International Greenhouse Gas Trading: A 'Silver Bullet' Train?" presented to Sidebar Meeting, United Nations Framework Convention on Climate Change, Bonn, Germany, October 23, 1997.
- "International Greenhouse Gas Trading," presented to the American Council for Capital Formation Conference on Global Warming, Washington, DC, September 24, 1997.
- "International Greenhouse Gas Trading," presented to the National Association of Manufacturers, Washington, DC, September 17, 1997.
- "International Greenhouse Gas Trading," presented to the American Automobile Manufacturers Association, Washington, DC, May 1, 1997.
- "Emission Trading: Alternative Approaches, Experience and Implications for CO₂," prepared for the AAMA Climate Change Task Force, Washington, DC, September 27, 1996.
- "Treatment of Greenhouse Gas Emissions in Electric Utility Resource Planning," prepared for the Third Conference on External Costs, *Internalization of Social Costs of Energy Conservation and Transportation in the United States and Europe for a Sustainable Development*, Ladenburg, Germany, May 29, 1995.
- "Distributive Impacts of Economic Instruments for Greenhouse Gas Abatement," presented at the Air & Waste Management Association International Specialty Conference *Global Climate Change: Science, Policy and Mitigation Studies*, Phoenix, Arizona, April 6, 1994.
- "New Approaches for Controlling Global Warming," presented to the Conference on Global Warming, Vermont Law School, South Royalton, Vermont, February 16, 1990.

B. Air Quality

- "Potential Impacts of EPA Air, Coal Combustion Residuals, and Cooling Water Regulations," presented to the U.S. Environmental Protection Agency, November 21, 2011.
- "Potential Impacts of EPA Air, Coal Combustion Residuals, and Cooling Water Regulations," presented to the U.S. Office of Management and Budget, November 8, 2011.

- "Potential Impacts of EPA Air, Coal Combustion Residuals, and Cooling Water Regulations," presented to the U.S. Treasury Department, October 26, 2011.
- "Potential Impacts of EPA Air, Coal Combustion Residuals, and Cooling Water Regulations," presented to the White House Office of Public Engagement, October 25, 2011.
- "Economic Effects of State Restrictions on Interstate Mercury Trading," presented at the Electric Utilities Environmental Conference, Tucson, Arizona, January 22, 2007.
- "Using Emissions Trading to Regulate Mercury Emissions in Montana," presented at a Public Hearing, Billings, Montana, June 1, 2006.
- "Developing an Emissions Trading Program for Regional Haze," presented to Midwest RPO Regional Air Quality Workshop, Chicago, IL, June 28, 2005.
- "Developing an Emissions Trading Program for Regional Haze," presented to the Visibility Improvement State and Tribal Association of the Southeast (VISTAS), via conference call from Boston, MA, June 1, 2005.
- "Economic and Environmental Analyses of CARB Tier 3 Non-Handheld Exhaust Emission Regulations," presented to the California Air Resources Board staff in Sacramento, CA via videoconference from Boston, MA, September 18, 2003.
- "Market Based Instruments and Shipping Emissions," presented to conference sponsored by DG Environment, Brussels, September 5, 2003.
- "Economic and Environmental Analyses of CARB Tier 3 Non-Handheld Emission Regulations: Status Report and Preliminary Results", presented to Outdoor Power Equipment Institute and Engine Manufacturers Association (OPEI & EMA), Washington, DC, August 26, 2003.
- "Ex Post Evaluation of the RECLAIM Emissions Trading Program for the Los Angeles Air Basin", presented to OECD Workshop on Ex Post Evaluation of Tradable Permits: Methodological and Policy Issues, Paris, January 21, 2003.
- "Emissions and Cost-Effectiveness of the Pull-Ahead Requirements for Heavy Heavy-Duty Diesel Engines," presented to U.S. Office of Management and Budget, Washington, DC, July 24, 2002.
- "Economic Analysis of Alternative EPA Snowmobile Regulations," presented to U.S. Environmental Protection Agency Office of Mobile Sources, Ann Arbor, Michigan, May 1, 2002.
- "Impacts of ZEV Sales Mandate on California Fleet Emissions," presented to the California Air Resource Board, Sacramento, CA, September 7, 2000.

"Economic Assessment of the Cost-Effectiveness of Alternative MACT Standards for the Metal Coil Surface Coating Industry," presentation to the U.S. Environmental Protection Agency, Research Triangle Park, North Carolina, August 2, 2000.

"Economics and Environmental Regulation: Opportunities and Obstacles," presented to Crowell & Moring, LLP, Washington, DC, March 22, 2000.

"RECLAIM: A Comprehensive Approach to Air Quality Regulation," presented to Edison Electric Institute, Washington, DC, March 6, 2000.

"Economic Assessment of the Cost-Effectiveness of Alternative Phase 2 Regulations for Handheld Engines," presented to the U.S. Environmental Protection Agency and Office of Management and Budget, Washington, DC, February 14, 2000.

"Economic Assessment of the Cost-Effectiveness of Alternative Phase 2 Regulations for Handheld Engines," presented to the U.S. Environmental Protection Agency, Office of Mobile Sources, Washington, DC, October 12, 1999.

"Economic Assessment of the Cost-Effectiveness of Alternative Phase 2 Regulations for Handheld Engines," presented to the U.S. Environmental Protection Agency, Office of Mobile Sources, Ann Arbor, Michigan, October 8, 1999.

"Costs & Benefits of Fish Protection Alternatives at the Salem Generating Facility," presented to the New Jersey Department Environmental Protection, Trenton, New Jersey, May 4, 1999.

"Economic Impacts of ARB Staff Proposed Marine Emission Standards," presented to the California Air Resources Board Hearing, Sacramento, California, December 10, 1998.

"Cost-Benefit Analysis of MACT Standards for Boat Manufacturing," presented to the National Marine Manufacturers Association, Tampa, Florida, October 15, 1998.

"Economic Analyses of Alternative California Standards for Exhaust Emissions from Marine Engines," presented to California Air Resources Board, Sacramento, California, October 9, 1998.

"Tradable Permits for Air Pollution Control: The United States Experience," presented to the Organization for Economic Cooperation and Development Workshop on Domestic Tradable Permit Systems for Environmental Management, Paris, September 24, 1998.

"NO_X Trading Program to Implement EPA's SIP Call," presented to Indiana Department of Environmental Management, Indianapolis, Indiana, May 4, 1998.

"Economic Analysis of Alternative EPA Standards for Large CI Non-Road Engines: Draft NERA Results," presented to the Engine Manufacturers Association and the Equipment Manufacturers Institute, Chicago, Illinois, September 4, 1997.

- "Cost-Effectiveness of ARB Small Off-Road Engine Regulations: Preliminary Results," presented to the California Air Resources Board, Sacramento, California, May 2, 1997.
- "RECLAIM: Turning Theory Into Practice for Emissions Trading in the Los Angeles Air Basin," presented to the NERA Seminar on Tradable Permits, London, United Kingdom, April 11, 1997.
- "RECLAIM: Turning Theory Into Practice for Emissions Trading in the Los Angeles Basin," presented to the *International Workshop on Tradable Permits, Tradable Quotas and Joint Implementation*, University of Sussex, Brighton, United Kingdom, April 9, 1997.
- "Economic Analyses of Alternative ARB Regulatory Requirements for Small SI Non-Handheld Engines," presented to the California Air Resources Board staff, El Monte, California, February 4, 1997.
- "Cost-Effectiveness of Alternative Emission Control Technologies for Small Utility Engines," presented to California Air Resources Board staff, El Monte, California, December 18, 1996.
- "Emission Regulations for Non-Road Engines," presentation to the U.S. Environmental Protection Agency, Ann Arbor, Michigan, July 17, 1996.
- "Valuation of Externalities: Methods and Examples," presented to the PSP&ED Advisory Group of the Hawaiian Electric Company, Honolulu, Hawaii, April 3, 1996.
- "Valuation of Externalities: Experience and Methods," presented to the Hawaiian Electric Company Externalities Advisory Group, Honolulu, Hawaii, January 31, 1996.
- "Emission Regulations for Small Utility Engines," presented to Small Non-Road Engine Regulatory Negotiations, Ann Arbor, Michigan, December 13, 1995.
- "Economic Evaluation of Alternative Regulations of Exhaust Emissions from Small Utility Engines," presented to U.S. Environmental Protection Agency, Ann Arbor, Michigan, November 28, 1995.
- "Emission Regulations for Small Utility Engines," presented to California Air Resources Board staff, El Monte, California, October 3, 1995.
- "Briggs & Stratton/NERA Phase 2 Economic Study," presented to U.S. Environmental Protection Agency, Ann Arbor, Michigan, September 22, 1995.
- "RECLAIM: Turning Theory Into Practice for Emissions Trading in the Los Angeles Basin," presented to the Stanford Law School Environmental Markets Seminar, Stanford, California, March 8, 1995.
- "Emission Trading for NO_X: Experience with RECLAIM," presented to Edison Electric Institute, Washington, DC, May 26, 1994.

"Emission Trading for NO_X: The RECLAIM Experience," presented to Edison Electric Institute, May 13, 1994.

"Projecting the Price of RECLAIM Trading Credits for NO_X," presented at a California Energy Commission Workshop, Sacramento, California, February 4, 1994.

Comments on "Presumptive Pigouvian Tax: Complementing Regulation to Mimic an Emissions Fee," presented to the Conference on Market Approaches to Environmental Protection, Stanford University, Palo Alto, California, December 3, 1993.

"Economic Effects of Regulatory Requirements to Protect Grand Canyon Visibility," presented to the Grand Canyon Visibility Transport Commission, Salt Lake City, Utah, October 21, 1993.

"Evolving Role of Externalities in Utility Activities," presented to the Electric Power Research Institute Energy Analysis Task Force, Nashville, Tennessee, September 29, 1993.

"External Costs of Electricity Generation in Southern Nevada," presented on behalf of Nevada Power Company, at a workshop sponsored by the Nevada Public Service Commission, Las Vegas, Nevada, May 19, 1993.

"Environmental Externalities," presented to Central and Southwest Corporation, Dallas, Texas, May 4, 1993.

"Creating Markets for Environmental Protection: Overview of Experience with Tradable Permit Systems," presented at The Claremont Institute

Conference *Environmental Protection Through Market Incentives: A Strategy for the Future*, Los Angeles, California, January 20-21, 1993.

"Tradable Permits and Social Costing: The California Experience," presented at the American Economic Association and Allied Social Science Association Meetings, Anaheim, California, January 6, 1993.

"The Distributive Impacts of Economic Instruments for Environmental Policy," presented to the OECD Group on Economic and Environmental Policy Integration, Paris, November 19, 1992.

"Emissions Trading: A Better Way to Incorporate Environmental Costs in Electric Utilities Resource Planning," presented at the Pace University

Center for Environmental Legal Studies Conference on *Incorporation of Social Costs of Energy in Resource Acquisition Decisions*, Racine, Wisconsin, September 8-11, 1992.

"Banking and Trading of Air Emission Reduction Credits," presented to the State of Connecticut Office of Policy and Management Meeting on Emissions Trading, Hartford, Connecticut, July 22, 1992.

- "The Distributive Effects of Economic Instruments for Environmental Policy," presented to the OECD Group on Economic and Environmental Coordination, Paris, June 18, 1992.
- "A Marketable Permits Program for the Los Angeles Air Basin," prepared for MIT Center for Energy and Environmental Policy Research *1992 New Developments Workshop*, Cambridge, Massachusetts, April 30, 1992.
- "The Road From Theory to Practice: Developing a Marketable Permits Program for the Los Angeles Air Basin," seminar presented to the MIT Center for Energy and Environmental Policy Research, Cambridge, Massachusetts, March 11, 1992.
- "Southern California Edison Damage-Based Values for Residual Emissions Valuation," presented to the California Energy Commission ER 92 Committee Workshop on Air Emission Damage Functions, Sacramento, California, January 29, 1992.
- "Turning Theory Into Practice: Developing a Marketable Permits Program for the Los Angeles Basin," prepared for Project 88 -- Round II Seminar, John F. Kennedy School of Government, Harvard University, Cambridge, Massachusetts, December 11, 1991.
- "Workshop on Economic Instruments," prepared for Imperial Oil Ltd., Toronto, Canada, October 1-2, 1991.
- "Market-Based Approaches to Air Quality Improvement," presented to the Board of Directors of the California Council for Environmental and Economic Balance, San Diego, California, July 1991.
- "Environment and Equity," presented to the Board of Directors of the California Council for Environmental and Economic Balance, San Diego, California, July 1991.
- "Contribution of Economists to Environmental Policy: Comments on the Gruenspect-Lave Critical Review," presented to the Air and Waste Management Association, Vancouver, British Columbia, June 19, 1991.
- "Airports and Economic Development," presented to the Southeast Chicago Development Commission, Chicago, Illinois, May 24, 1991.
- "Environmental Economics in the 1990s," presented to the OECD Group of Economic Experts, Paris, May 16, 1991.
- "The Clean Air Act: How to Make the Mandate Worth the Effort," presented to the Workshop on Emerging Environmental Policies and Business, North Carolina State University, Raleigh, North Carolina, April 18, 1991.

- "Market-Based Approaches to Managing Air Emissions in California's South Coast Basin," presented to Workshop on Market Incentives, South Coast Air Quality Management District, El Monte, California, January 29, 1991.
- "Market-Based Approaches to Managing Air Emissions in California's South Coast Basin," presented to the Steering/Advisory Committee on Market Incentives, South Coast Air Quality Management District, Los Angeles, California, December 11, 1990.
- "How Environmental Policies Influence Natural Gas Markets," presented to the Conference on Emerging Competition in California Gas Markets, sponsored by the California Energy Commission, San Diego, California, November 9, 1990.
- "Air Quality and Electric Vehicles," presented to the Electric Vehicle Symposium, sponsored by the Western Energy Supply and Transmission Associates, Ontario, California, November 8, 1990.
- "Incorporating Environmental Impacts in Public Utility Commission Regulation," presented to the Energy Research Group, Washington, DC, November 6, 1990.
- "The Promise and Performance of the Acid Rain Allowance Program," presented to the Conference on the New Acid Rain Legislation: Capitalizing on a Market-Based Approach, sponsored by Public Utilities Reports, Inc., Washington, DC, October 24, 1990.
- "What Environmental Legislation Means for Crude Oil Marketers: A U.S. Overview," prepared for the Oxford College of Petroleum Studies, Long Beach, California, presented October 1, 1990.
- "Market-Based Approaches for Environmental Improvement," presented to the Eleventh Annual Antitrust and Trade Regulation Seminar, sponsored by National Economic Research Associates, Santa Fe, New Mexico, July 5-7, 1990.
- "Using Market-Based Approaches in the Energy Sector," presented to the OECD Economic Incentives Working Group, Paris, June 19-20, 1990.
- "Emissions Trading: Concepts and Experience," prepared for The Canadian Electrical Association and presented at the *Workshop on Tradable Permits*, Toronto, Canada, June 13, 1990.
- "Prototypical Trading Policy: Stationary Sources of NO_X," prepared for NO_X/VOC Task Force and presented at the *Workshop on Flexible Mechanisms*, Montreal, Canada, June 6-7, 1990.
- "Emissions Trading: An Overview of Concepts and Experience," prepared for NO_X/VOC Task Force and presented at the *Workshop on Flexible Mechanisms*, Montreal, Canada, June 6-7, 1990.
- "Market-Based Approaches for Environmental Improvement," presented to the Board of Directors, The Conference Board of Canada, Edmonton, Canada, May 30, 1990.

"Market-Based Approaches for Environmental Protection: Lessons from the U.S. Experience," presented to the Advisory Board, Research Program on Business and the Environment, The Conference Board of Canada, Toronto, Canada, April 24, 1990.

"Ozone and Economics," presented to the Air and Waste Management Association, Los Angeles, California, March 20, 1990.

"Clear Thinking on Clear Air: Agenda for the 1990's," paper and panel discussion presented at the American Enterprise Institute's Thirteenth Annual Policy Conference, Washington, DC, December 4, 1989.

"The Acid Rain Allowance Program," presented to the Energy Research Group, Washington, DC, November 3, 1989.

C. Water Quality

"Benefit-Cost Analysis in Section 316(b) BTA Determinations: The Road Ahead," presented at the American Fisheries Society Symposium, Seattle, Washington, September 6, 2011.

"Cost-Benefit Analysis for Fish Impingement and Entrainment Reduction at Pickering Nuclear Generating Station," presented to Canadian Nuclear Safety Commission, Ottawa, Canada, October 29, 2009.

"Cost-Benefit Analysis for Fish Impingement and Entrainment Reduction at Pickering Nuclear Generating Station," presented at Ontario Power Generation Inc. Stakeholder Workshop, Ontario, Canada, September 29, 2009

Uncertainty in §316(b) Compliance Demonstration: Case Study Including Monte Carlo Analysis," presented at the UWAG/EPRI Conference on Technologies and Techniques for §316(b) Compliance, Atlanta, Georgia, September 7, 2006.

"Electricity System Impacts of Nuclear Shutdown Alternatives," presented to New York City Council, New York, NY, May 7, 2002.

"Electricity System Impacts of Nuclear Shutdown Alternatives," presented to Westchester County Board of Legislators Committee on Environment and Health, Westchester, New York, April 29, 2002.

"An Economic Approach to 316(b) BTA Determination," presented to the UWAG 316(b) Technical Workshop for the Environmental Protection Agency, Annapolis, Maryland, January 25, 2001.

"Methodology for Cost-Benefit Assessment of Fish Protection Alternatives for the Mercer Facility," presentation to the Mercer 316(b) Permit Team, Newark, New Jersey, August 8, 2000.

- "Roadmap for Costs & Benefits of Fish Protection Alternatives for the Salem Facility," presented to the Monitoring Advisory Committee, Mt. Laurel, New Jersey, December 9, 1999.
- "Natural Resource Damage Assessments: Economic Techniques," presented to PSE&G, Newark, New Jersey, December 9, 1997.
- "Use of Economic Analysis in Environmental Impact Statements and Other Regulatory Proceedings," presented to Hudson River Utilities, New York, New York, November 19, 1997.
- "Combining Science and Economics: The Case of Superfund," presented to ENVIRON, Princeton, New Jersey, May 16, 1995.
- "Social Costing: Policy Overview," presented to the British Columbia Utilities Commission Social Costing Workshop, Vancouver, British Columbia, March 29, 1995.

D. Economic Impact

- "Financial Implications of a US Cap-and-Trade Program for Sectors and Companies," presented at 2nd Annual Carbon Trading Summit, New York City, January 13, 2010.
- "Evaluating the Impact of Future E.U. Chemical Policy on the French Economy," presented to REMI Northeast Policy Analysis and Users' Conference, Boston, MA, January 31, 2006.
- "Background on NERA Study 'Socioeconomic Effects of the Niagara Power Project and Local NYPA Presence'," presented to Niagara Power Project Relicensing Stakeholder Meeting, Niagara Falls, NY, November 13, 2003.
- "Economic Benefits to the Chicago Region from the Whitecap Energy System," presented to the Illinois Department of Natural Resources, Springfield, Illinois, January 30, 2001.
- "Fueling Electricity Growth for a Growing Economy," presented to Edison Electric Institute, Palm Springs, California, January 13, 2000.
- "Economic Impact Analyses with REMI: Two Case Studies," presented to the REMI Seminar, Miami, Florida, October 6, 1997.
- "Impacts on the Hawaii Economy of Alternative Resource Plans for Oahu," presented to the Hawaiian Electric Company IRP Advisory Group, Honolulu, Hawaii, July 24, 1997.
- "Economic and Environmental Effects in Maine of the Maritimes & Northeast Pipeline Project," presented to the Maine Economic Development Council, Rockland, Maine, February 12, 1997.
- "Economic and Environmental Effects of the Maritimes & Northeast Pipeline Project," presented to a media conference and Editorial Boards of the *Bangor Daily News*, the *Portland Press Herald*, and the *Kennebec Journal*, Bangor and Augusta, Maine, November 21, 1996.

"Assessing the Economic Impacts of Alternative HECO Resource Plans," presented to the PSP&ED Advisory Group of the Hawaiian Electric Company, Honolulu, Hawaii, July 3, 1996.

"The Lake Calumet Airport and Chicago's Economic Future," presented to the Lake Calumet Airport Advisory Committee, Chicago, Illinois, July 2, 1991.

"Socioeconomic Impacts of Proposed Rule 431.2," prepared for Southern California Edison and presented to the South Coast Air Quality Management District, Los Angeles, California, May 4, 1990.

"An Economist Looks at the Federal Regulation of Biotechnology," presented to the Conference on Emerging Issues in Biotechnology, sponsored by Boston University Law School, Boston, Massachusetts, March 2, 1990.